

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

---

**PROGRESSIVE NORTHERN INSURANCE  
COMPANY**

**Plaintiff,**

**v.**

**G & L TRUCKING, LLC, et al.**

**Defendants.**

---

)  
)  
)  
)  
) **Civil Action No. 3:18-cv-00829-JAG**  
)  
)  
)  
)  
)  
)

**STIPULATION OF DISMISSAL**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Progressive Northern Insurance Company and Defendant Steve Elliott, by and through their respective counsel, hereby stipulate and agree that this entire action shall be dismissed without prejudice as to all parties (including those that have not appeared in this action), with each party bearing its own costs and attorney's fees. The other Defendants named in this action, G & L Trucking, LLC, Shawn Gershaw, and Daimon Meredith, have not appeared in this action and are not required to join in this stipulation pursuant to Rule 41(a)(1)(A)(ii).

DATED:        October 18, 2018

/s/ Lindsay L. Rollins

John B. Mumford, Jr. (VSB No.: 38764)  
Lindsay L. Rollins (VSB No.: 86362)  
Hancock, Daniel & Johnson, P.C.  
4701 Cox Road, Suite 400  
Glen Allen, Virginia 23060  
jmumford@hancockdaniel.com  
lrollins@hancockdaniel.com  
Telephone: (804) 967-9604  
Facsimile: (804) 967-9888  
*Counsel for Progressive Northern Insurance  
Company*

/s/ John Janney Rasmussen

John Janney Rasmussen (VSB No.: 45787)  
Insurance Recovery Law Group, PLC  
P.O. Box 38518  
Richmond, Virginia 23231  
Telephone: (804) 308-1359  
jjr@insurance-recovery.com  
*Counsel for Defendants Steve Elliott*